vided the statements are pertinent and relevant to the questions involved. *Youmans v. Smith* (1897) 153 N. Y. 214, 47 N. E. 265; *Maulsby v. Reifsnider* (1888) 69 Md. 143, 14 Atl. 505; *Lawson v. Hicks* (1862) 38 Ala. 279, 81 Am. Dec. 49. A few courts have afforded the same immunity when the statements were made in proceedings for the disbarment of an attorney, in proceedings before the Interstate Commerce Commission, and before the Governor in extradition proceedings. *Brown v. Globe P. Co.* (1908) 213 Mo. 611, 112 S. W. 462; *Duncan v. Atchison, etc., R. Co.* (1896) 72 Fed. 808, 19 C. C. A. 202; *Youmans v. Smith, supra.* And affidavits pertaining to the moral character of an applicant for admission to the bar, when filed in obedience to a mandate of the court, have been held absolutely privileged. *Baggett v. Grady* (1911) 154 N. C. 342, 70 S. E. 618. And the remarks of a college president before the board of trustees which was investigating charges against his character were held absolutely privileged on the ground that the board was properly functioning like a court of law. *Gattis v. Kilgo* (1901) 128 N. C. 402, 38 S. E. 931. However, the decision of the instant case would seem to be in harmony with the tendency of the courts not to extend the scope of absolute privilege in libel to include proceedings which are not strictly judicial, although they are official and public. *Bingham v. Gaynor* (1911) 203 N. Y. 27, 96 N. E. 84; *Blakeslee v. Carroll* (1894) 64 Conn. 223, 29 Atl. 473, 25 L. R. A. 106; *Wright v. Lothrop* (1889) 149 Mass. 385. But on a state of facts identical with that in the principal case, the Court of Civil Appeals of Texas held the counsel's statement absolutely privileged. *Connellee v. Blanton* (1914, Tex. Civ. App.) 163 S. W. 404.

PRIZE LAW—RETALIATORY ORDER IN COUNCIL OF BELLIGERENT—NEUTRALS MUST BEAR REASONABLE LOSSES.—A Norwegian vessel bound from Norway to Rotterdam with iron-ore briquettes belonging to neutrals but destined to Germany was stopped on the high seas and ordered to discharge her cargo in England. This action was taken under an Order in Council, issued in retaliation against Germany's war-zone decree, by which Order, without the establishment of a legal blockade, all trade to and from neutral ports in cargo bound to or from Germany was prohibited. The cargo having been sold and freight allowed, the neutral owners of the vessel instituted a claim for damages arising out of her alleged unlawful detention. *Held,* that the claim must be dismissed. *The Stigstad* (1918, P. C.) 35 Times L. R. 176.

See COMMENTS, p. 583, *supra.*

RELEASE—PERSONAL INJURIES—RELEASE OF MASTER AS BARRING ACTION AGAINST SURGEON.—The plaintiff suffered a rupture in his right groin while in the employ of the New York Central R. R. He consulted the defendant, who, mistaking the plaintiff for another of his patients, performed an operation on the left side. The plaintiff executed a release of his claim against the railroad, and later brought this action against the defendant for the unauthorized surgical operation. *Held,* that the plaintiff could recover, as the operation on the left side was a wholly wrongful, independent and intervening cause of action. *Purchase v. Seelye* (1918, Mass.) 121 N. E. 413.

Where the plaintiff has exercised due care in engaging medical attendants, the liability of the party who caused the original injury extends, not only to that injury, but also to negligence or lack of skill on the part of the attending surgeon, such maltreatment being "constructively anticipated" as a "rational result" of the original injury. *Hunt v. Boston Terminal Co.* (1912) 212 Mass. 99, 98 N. E. 786; *Pullman's Palace Car Co. v. Bluhm* (1884) 109 Ill. 20, 50 Am. Rep. 601. Hence a full release to the employer, without reservation, under the law as to joint tort-feasors bars an action against the surgeon. *Martin v. Cunningham* (1916) 93 Wash. 517, 161 Pac. 355. The principal case limits this